April 21, 2006

VIA ELECTRONIC FILING AND HAND DELIVERY

The Honorable Kent A. Jordan **United States District Court** District of Delaware 844 N. King Street, Room 6325 Lockbox 10 Wilmington, De 19801

> **Adams Golf Securities Litigation** C.A. No. 99-371 KAJ

Dear Judge Jordan:

My firm has electronically filed a proposed Amended Scheduling Order in this case. At the hearing, Your Honor suggested keeping to the August 28, 2006 trial date. While the parties would like to try this case as soon as possible, the parties' previously filed Stipulation (D.I. 192) provides for 81 days of fact discovery from the date of the Order on the motion to dismiss. That means that fact discovery ends June 30, 2006. The Stipulation further provides that the remaining deadlines shall be adjusted. Given the parameters, the parties have agreed to submit a new scheduling order that provides for a trial this year.

Briefly, the proposed Scheduling Order provides:

Fact discovery cut-off	June 30, 2006
Expert reports due	July 7, 2006
Expert Rebuttal Reports due	July 21, 2006
Expert discovery cut-off	August 4, 2006
Case dispositive and Daubert Motions due	August 25, 2006
Oppositions to motion due	September 13, 2006
Reply memorandum due	September 25, 2006
Joint Pretrial Order	November 13, 2006
Voir Dire and Jury Instructions	November 20, 2006
Pretrial Conference	November 27, 2006
Trial	December 4, 2006

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To ensure that the trial will end well before Christmas 2006, the parties have compressed the time frame a great deal. Accordingly, the parties are especially concerned that there may not be adequate time for the Court to decide dispositive motions. If we have not left the Court sufficient time to decide the motions, or if the dates for the pretrial conference or trial conflict with the Court's schedule or the Court does not approve of any of these dates, the parties are willing to propose a new schedule.

Document 232-2

Respectfully,

/s/ Carmella P. Keener

Carmella P. Keener (DSBA No. 2810) On Behalf of All Parties

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